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27D, LLC; LM Realty 24C, LLC;
LM Realty 23H, LLC; LM Realty 20A, LLC;
LM Realty 18 West, LLC; The Larisa Markus
Revocable Trust; The Larimar Foundation;
Protax Services Inc.; Protax Services Consulting, Inc.;
Ilya Bykov; First Integrated Construction, Inc.; and
Innovative Construction Group, Inc.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re: Chapter 15
Foreign Economic Industrial Bank
Limited, “Vneshprombank” Ltd., Case No. **16-13534** (MG)
Debtor in a Foreign Proceeding.

-----X
In re: Chapter 15
Larisa Markus,
Debtor in a Foreign Proceeding. Case No. **19-10096** (MG)
-----X

NOTICE OF APPEAL AND STATEMENT OF ELECTION

LM Realty 31B, LLC; LM Realty 27D, LLC; LM Realty 24C, LLC; LM Realty 23H, LLC; LM
Realty 20A, LLC; LM Realty 18 West, LLC; The Larisa Markus Revocable Trust; The Larimar
Foundation; Protax Services Inc.; Protax Services Consulting, Inc.; Ilya Bykov; First Integrated
Construction, Inc.; and Innovative Construction Group, Inc. (the “LM Entities and Protax
Entities”), by and through their attorneys The Law Offices of Daniel A. Singer PLLC, hereby

appeals to the United States District Court for the Southern District of New York pursuant to 28 USC §158(a)(1) and Federal Rules of Bankruptcy Procedure 8001, 8002, and 8003, to the United States District Court for the Southern District of New York from the Order Concerning Discovery From The LM Entities And Protax Entities (the “Order” annexed to the docket for case no 16-13534 [the “Bank Docket”] as *dkf no. 165* and annexed to the docket for case no 19-10096 [the “LM Docket”] as *dkf no. 185*), entered on October 31, 2019, by the United States Bankruptcy Court for the Southern District of New York (Hon. Martin Glenn) in the above-captioned bankruptcy case. The LM Entities and Protax Entities’ appeal of the Order includes, without limitation, any and all judgments, orders, decrees, rulings, opinions and/or decisions that merged into and/or became part of the Order, that are related to the Order, and/or upon which the Opinion and Order is based.

A true and correct copy of the Order is annexed hereto as Exhibit A¹.

The names of all parties to this appeal and the names and addresses of their respective counsel are as follows:

Case No.: 16-13534

Party	Counsel
LM Realty 31B, LLC; LM Realty 27D, LLC; LM Realty 24C, LLC; LM Realty 23H, LLC; LM Realty 20A, LLC; LM Realty 18 West, LLC; The Larisa Markus Revocable Trust; The Larmar Foundation; Protax Services Inc.;	Daniel A. Singer, Esq. The Law Offices of Daniel A. Singer PLLC 630 Third Avenue, 18 th Floor New York, New York 10017

¹ The Order filed on the Bank Docket is identical to the Order filed on the LM Docket except that the Order filed on the Bank Docket contains the case number, docket number, and date and time of filing on the first page of the Order whereas the Order filed on the LM Docket does not. Copies of the Order as it appears on both dockets respectively are annexed hereto as Exhibit A. Certain deadlines set forth in the Order have been extended by Judge Martin Glenn pursuant to “So Ordered” stipulations dated November 5, 2019 (Exhibit B hereto, *Bank dkt no. 168*; *LM dkt no. 191*) and “So Ordered” stipulation dated November 8, 2019 (Exhibit C hereto, *bank dkt no. 172*; *LM dkt no. 203*), respectively.

Protax Services Consulting, Inc.; Ilya Bykov; First Integrated Construction, Inc.; and Innovative Construction Group, Inc	
Larisa Markus	Victor A. Worms, Esq. Law Offices of Victor A. Worms 48 Wall Street, Suite 1100 New York, New York 10005
Foreign Economic Industrial Bank Limited, “Vneshprombank” Ltd., <i>Debtor in a Foreign Proceeding and Foreign Representative</i>	Bruce Samuel Marks, Esq. Nina Farzana Khan, Esq. Marks & Sokolov, LLC 1835 Market Street, Suite 1717 Philadelphia, Pennsylvania 19103 Evan J. Zucker, Esq. Blank Rome LLP 1271 Avenue of the Americas New York, New York 10020 Victor A. Worms, Esq. Law Offices of Victor A. Worms 48 Wall Street, Suite 1100 New York, New York 10005
State Corporation “Deposit Insurance Agency”, <i>Trustee and Foreign Representative of the Foreign Economic Industrial Bank Limited, “Vneshprombank” Ltd.</i>	Bruce Samuel Marks, Esq. Nina Farzana Khan, Esq. Marks & Sokolov, LLC 1835 Market Street, Suite 1717 Philadelphia, Pennsylvania 19103 Rick Bruce Antonoff, Esq. Evan J. Zucker, Esq. Blank Rome LLP 1271 Avenue of the Americas New York, New York 10020 Barry N. Seidel, Esq. Harrington, Ocko & Monk, LLP 81 Main Street, Suite 215 White Plains, NY 10601

Case No: 19-10096

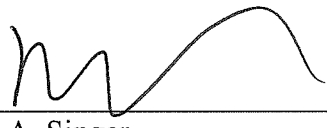
Party	Counsel
LM Realty 31B, LLC; LM Realty 27D, LLC; LM Realty 24C, LLC; LM Realty 23H, LLC; LM Realty 20A, LLC; LM Realty 18 West, LLC; The Larisa Markus Revocable Trust; The Larimar Foundation; Protax Services Inc.; Protax Services Consulting, Inc.; Ilya Bykov; First Integrated Construction, Inc.; and Innovative Construction Group, Inc	Daniel A. Singer, Esq. The Law Offices of Daniel A. Singer PLLC 630 Third Avenue, 18 th Floor New York, New York 10017
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	Philip Michael Guffy Blank Rome LLP 717 Texas Avenue, Suite 1400 Houston, Texas 77002
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There is no Bankruptcy Appellate Panel in this District and thus the optional election in Official Form 417A is not applicable.

Dated: New York, New York
November 14, 2019

THE LAW OFFICES OF DANIEL A. SINGER
PLLC

By: 
Daniel A. Singer

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